

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0102041
to discharge to waters of the State of Louisiana.
AI No.: 9688 / Activity No.: PER20080001

THE APPLICANT IS: City of Shreveport
Public Works Fleet
P.O. Box 31109
Shreveport, LA 71130

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: September 29, 2008

1. PERMIT STATUS

- A. LPDES permit – LA0102041
LPDES permit effective date: November 1, 2003
LPDES permit expiration date: October 31, 2008
- B. LWDPs permit – NA
LWDPs permit effective date: NA
LWDPs permit expiration date: NA
- C. Date Application Received: April 28, 2008

2. FACILITY INFORMATION

- A. FACILITY TYPE/ACTIVITY – exterior vehicle and equipment maintenance facility

This is an existing exterior vehicle and equipment maintenance facility for the City of Shreveport. The facility washes the exteriors of garbage trucks prior to maintenance. garbage cans that are returned by customers are rinsed out and then made available for use to other customers. The wastewater from the two wash racks is piped to a stormsepor system where it commingles with stormwater before discharging via Outfall 001 to Ockley Ditch.

This facility does not qualify for coverage under the LPDES General Permitting System because the rinsing of garbage cans is not an activity that is covered by any LPDES General Permit.

- B. FEE RATE
 - 1. Fee Rating Facility Type: minor
 - 2. Complexity Type: I

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3. Wastewater Type: II
4. SIC code: 7699 and 7538

C. LOCATION - 1731 Kings Highway
Shreveport, Caddo Parish
Latitude +32° 28' 52", Longitude -93° 45' 52"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Commingled exterior vehicle and equipment wash wastewater and stormwater

Treatment: Stormsepor system which is a an oil/solids/water separator

Location: at the point of discharge from the stormsepor system prior to mixing with other waters

Flow: 8,000 GPD (one day a week)

Discharge Route: by pipe to Ockley Ditch, thence to Bayou Pierre (100601)

4. RECEIVING WATERS

STREAM – Outfall 001– by pipe to Ockley Ditch, thence to Bayou Pierre

BASIN AND SEGMENT – Red River – Subsegment 100601

DESIGNATED USES -

- a. Primary contact recreation
- b. Secondary contact recreation
- c. Propagation of fish and wildlife
- d. Agriculture

5. EXISTING EFFLUENT LIMITS

1. **Outfall 001** – Commingled exterior vehicle and equipment wash wastewater and stormwater

<u>Pollutant</u>	<u>Limitation</u>	<u>Monitoring</u>
	Mo. Avg: Daily Max	
Flow (GPD)	Report: Report	Quarterly
TSS	---:45 mg/l	Quarterly
COD	---: 125 mg/l	Semiannually
Oil & Grease	---: 15 mg/l	Quarterly
Aluminum	---:2.0 mg/l	Quarterly
pH	6.0 - 9.0 s.u.	Quarterly
Soaps and/or Detergents	Report: ---	Quarterly
Visible Sheen	---: No Presence	Daily

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6. PROPOSED EFFLUENT LIMITS

BASIS – See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There are no inspections on file since **January 1, 2005**. There are no open, appealed, or pending OES enforcement actions since **January 1, 2005**. There is no EPA enforcement history on file since **January 1, 2005**.

B. DMR Review/Excursions

A DMR Review was conducted for the period of January 2005 – June 2008. 14 DMRs were on file which revealed 3 TSS excursions, 3 COD excursions, 6 Aluminum excursions, 2 Oil & Grease excursions and 1 pH not reported.

8. ENDANGERED SPECIES

The receiving waterbodies and proposed discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 100601, Bayou Pierre – From headwaters to Bayou Pierre, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 100601 was previously listed as impaired for organic enrichment/low DO and nutrients, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 100601:

Bayou Pierre Organic Enrichment/Low DO and Nutrients TMDL

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As per the TMDL, point source loads are so small as to be insignificant, and because effective policies are in place to limit nutrient discharges, no specific reductions from point sources are required. The organic enrichment/low DO impairment shall be addressed through the COD parameter.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

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Rationale for City of Shreveport – Public Works/Fleet Services

1. **Outfall 001** – Commingled exterior vehicle and equipment wash wastewater and stormwater

<u>Pollutant</u>	<u>Limitation*</u>	<u>Reference**</u>
	Mo. Avg: Daily Max	
Flow (GPD)	Report: Report	LAC 33:IX.2361.1.1.b
TSS	---: 45 mg/L	Similar discharges (BPJ)
COD	---: 125 mg/L	Similar discharges (BPJ)
Oil & Grease	---: 15 mg/L	Similar discharges (BPJ)
Aluminum	---: 2.0 mg/L	Similar discharges (BPJ)
pH	6.0 - 9.0 su	Similar discharges (BPJ)
Soaps and/or Detergents	Inventory Record: ---	Similar discharges (BPJ)
Visible Sheen	---: No Presence	Similar discharges (BPJ)

Treatment: Stormsepor system

***Monitoring Frequency:** Once per quarter for all pollutants, with the exception of once per day for visible sheen, at the point of discharge from the treatment unit prior to mixing with other waters. Soaps and Detergents: document in an inventory record 1/quarter the quantity and type of any Soap and/or Detergent used during each calendar month.

****Limits Justification:** For all parameters, limits and monitoring frequencies are based on the prior permit; the general permit for exterior vehicle wash wastewater (LAG750000) effective on March 15, 2004, current guidance for similar discharges, and BAT effluent guidelines for Aluminum found at 40 CFR 440 Subpart B (440.23). The Aluminum limit will be continued because of repeated exceedances of the limit in the previous permit.

BPJ Best Professional Judgment
GPD Gallons per Day
su Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for storm water contamination from processes including vehicle washing and maintenance.

The SWP3 shall be updated and maintained within sixty days from the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements of the Draft Permit).

Monitoring Frequency

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Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrates two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.